



CITY OF HALF MOON BAY

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CALIFORNIA
COASTAL COMMISSION

January 8, 2014

California Coastal Commission
c/o Sea-Level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Comments on the Draft Sea-Level Policy Guidance Document

Dear Coastal Commissioners,

We are responding to your request for comments on the Draft Sea-Level Rise Policy document that you have circulated for review. We certainly understand the need to consider the consequences of climate change and particularly the potential impacts on coastal communities resulting from sea-level rise (SLR). With that said, the draft policy document gives rise to a number of seriously troubling uncertainties on the coastal plan certification and implementation process. Some major areas of concern that are certain to be problematic include, but are by no means are limited to:

- 1) Discrepancies in Sea Level Rise projections
- 2) Highly technical baseline analysis of coastal conditions called for in the Local Hazard Condition Analysis
- 3) Unpredictability associated with certifying Local Coastal Plans (LCP) and Implementation Plans (IP) in conformance with these policies
- 4) Fiscal impacts on coastal communities and especially small coastal communities in complying with these complex regulations

1) Discrepancies in Sea Level Rise Projections: We fully acknowledge that the science of projecting or estimating sea level rise is extremely complex. However there is far too much variation in SLR projections (2000-2030 is between 1.56 to 11.76 inches). This difference of over 10 inches is of such a significant magnitude that it is almost incomprehensible. Furthermore, projections beyond 2030 (there are discrepancies between Tables 1 and 6) only compound this problem. We do not understand why there are, or is a need for different base year estimates for the same year of 2000. We have to be cautious about being overly conservative in projecting SLR that forces development and coastal infrastructure further from the shoreline at the expense of those that want to enjoy the coastal environment in accordance with the core principles of the Coastal Act.

- 2) Complicated Analysis Required in Developing the Local Hazard Condition Analysis: This requires highly technical and specialized analysis. More importantly, these analyses are quite often professionally and scientifically subjective and disagreement among experts will occur. These same disagreements resulting from subjective evaluations currently occur in determinations of habitat and levels of environmental significance. This chronic problem will only continue to get worse with a new plan element and field of analysis in the development of the Local Hazard Condition Analysis.
- 3) Unpredictability in Coastal Commission Certification Process: There is no clear standard of review when determining the adequacy or acceptability in the certification process of coastal amendments. In theory, no one disputes the importance in addressing environmental factors associated with SLR and its impact on resources, development and infrastructure on coastal communities. In practice and in current operation, there is no limit to the amount of information that is requested in the certification process. This extremely time consuming and protracted process will only add an entirely new area of analysis where confusion and disagreements over interpretation between city and Coastal Commission staff will continue to occur in the certification process of Local Coastal Programs and Implementation Plans.
- 4) Fiscal Impacts are significant: Staff time and resources, and especially those of small communities like ours, are already constrained and heavily impacted in administering our Local Coastal Program. We have placed nearly full time emphasis in completing the certification process for several critically important and long overdue LCP amendments. The SLR policies will increase the amount of staff time and effort that will need to be devoted to the certification process, adding further delay to the backlog.

We applaud your proactive approach at addressing climate change and sea level rise. In light of the factors discussed above, we find the program unwieldy, and it needs to be substantially simplified with clear and objective standards provided for predictability in completing amendments that eliminates the subjective and seemingly directionless negotiation process in securing certification of coastal plan amendments. Thank you for the opportunity to provide our suggested improvements to the process. We look forward to working with Coastal Commission staff in addressing these problems and developing reasonable, clear and effective policies and programs.

Sincerely,


Laura Snideman,
City Manager

cc: Mayor and City Council
Carole Groom, County Supervisor & Coastal Commissioner
Tony Condotti, City Attorney
Bruce Ambo, Planning Manager